

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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YIEN-KOO KING, NORTHWICH :  
INVESTMENTS LTD., and SOON HUAT, :  
INC. :

Plaintiffs, :

-against- :

ANDREW WANG, SHOU-KUNG WANG, :  
BAO WU TANG, JIAN BAO GALLERY, :  
ANTHONY CHOU, CHEN-MEI-LIN, WEI :  
ZHENG, YE YONG-QING, YUE DA-JIN :  
and JOHN DOES 1-9, :

Defendants. :

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Civ. Action No.: 1:14-cv-07694 (LJL)

**DECLARATION OF THOMAS B. KELLY  
IN FURTHER SUPPORT OF  
DEFENDANTS ANDREW WANG AND  
SHOU-KUNG WANG'S MOTION FOR  
SUMMARY JUDGMENT**

I, THOMAS B. KELLY, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, the following to be true and correct:

1. I am an attorney admitted to practice before this Court and a partner with the law firm Kasowitz Benson Torres LLP, counsel for defendants Andrew Wang ("AW") and Shou-Kung Wang ("SK" and together with AW the "Defendants") in the above-captioned action. I respectfully submit this declaration in further support of Defendants' Motion for Summary Judgment. I am fully familiar with all matters set forth in this declaration.

2. Attached hereto as Exhibit 131 is a true and correct copy of an email from Hilton Soniker to AW, Martin Klein, and Peter Schram, *et al.*, dated May 18, 2010, bearing Bates numbers AWSK\_00007801-802.

3. Attached hereto as Exhibit 132 is a true and correct copy of a letter from Bin Guo to the Surrogate Court of Manhattan, dated May 20, 2010, bearing Bates number KING002650.

Dated: New York, New York  
May 4, 2020

/s/ Thomas B. Kelly  
Thomas B. Kelly